

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DAVID J. HOWE,

Plaintiff,

vs.

U.S. BANK NATIONAL ASSOCIATION, AS  
TRUSTEE FOR THE RMAC TRUST SERIES  
2016-CTT and  
RUSHMORE LOAN MANAGEMENT  
SERVICES LLC,

Defendants.

CIVIL ACTION NO.: 1:19-cv-12597

**AFFIDAVIT OF CHRISTOPHER J. WILLIAMSON IN SUPPORT OF DEFENDANTS’  
OPPOSITION TO PLAINTIFF’S MOTION FOR EXPEDITED DECISION ON MOTION  
FOR PRELIMINARY INJUNCTION**

I, Christopher J. Williamson, hereby swear and affirm as follows:

1. I am more than 18 years of age, am competent to make this declaration, and have personal knowledge of the facts set forth in this declaration.

2. I am an attorney at Houser LLP, counsel of record for Defendants, U.S. Bank National Association, as Trustee for the RMAC Trust Series 2016-CTT (the “Trust”) and Rushmore Loan Management Services LLC (“Rushmore”) (together, the “Defendants”) in the above-referenced matter. I am admitted to the bar of this Court and make this affidavit in support of the Defendant’s Opposition to Plaintiff’s Motion for Expedited Decision on Motion for Preliminary Injunction. I have personal knowledge of each of the matters stated in this affidavit.

3. Attached hereto as **Exhibit A** are true and correct copies of email correspondences between counsel for all parties between January 5, 2020 and January 8, 2020.

4. Attached hereto as **Exhibit B** are true and correct copies of email correspondences between counsel for all parties between January 9, 2020 and January 10, 2020.

5. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff's Mortgage Statement, dated October 11, 2019.

6. Attached hereto as **Exhibit D** is a true and correct copy of the search results of the records of the Middlesex Superior Court from masscourts.org for all civil matters in which the Plaintiff was a party. The search was conducted on January 16, 2020 at approximately 10:00 a.m.

7. Attached hereto as **Exhibit E** are true and correct copies of all executions recorded on 12 Stuart St., Sudbury, MA from 2006 to the present where a discharge of said executions were not recorded.

8. Attached hereto as **Exhibit F** are true and correct copies of the search result of the records of the Massachusetts Office of Consumer Affairs and Business Regulation Home Improvement Contract Registration Lookup for all registrations related to the Plaintiff. The search was conducted on January 16, 2020 at approximately 10:15 a.m.

I declare under penalty of perjury under the laws of the Commonwealth of Massachusetts that the foregoing is true and correct.

DATED: January 16, 2020

/s/ Christopher J. Williamson  
Christopher J. Williamson, BBO No. 690589

**CERTIFICATE OF SERVICE**

I, Christopher J. Williamson, hereby certify that on January 16, 2020, a true and correct copy of the Affidavit of Christopher Williamson in Support of Defendants' Opposition to Plaintiff's Motion for Expedited Decision on Motion for Preliminary Injunction was served via ECF to:

Josef Culik  
Kristin L. Thurbide  
Culik Law PC  
101 Federal St., Suite 1900  
Boston, MA 02110

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 16, 2020

/s/ Christopher J. Williamson  
Christopher J. Williamson, BBO No. 690589